

STATE OF NORTH CAROLINA **FILED**

IN THE GENERAL COURT OF JUSTICE

COUNTY OF WAKE

2019 OCT 23 AM 9:02

SUPERIOR COURT DIVISION

WAKE COUNTY, C.S.C.

Docket No. 19-CVS-01266-7

BY _____ 

REBECCA HARPER; AMY CLARE
OSEROFF; DONALD RUMPH; JOHN
BALLA; RICHARD R. CREWS; LILY
NICOLE QUICK; GETTYS COHEN JR.;
SHAWN RUSH; JACKSON THOMAS
DUNN, JR.; MARK S. PETERS; JOSEPH
THOMAS GATES; KATHLEEN BARNES;
VIRGINIA WALTERS BRIEN; DAVID
DWIGHT BROWN,

Plaintiffs,

v.

REPRESENTATIVE DAVID R. LEWIS, IN
HIS OFFICIAL CAPACITY AS SENIOR
CHAIR OF THE HOUSE STANDING
COMMITTEE ON REDISTRICTING;
RALPH HISE, IN HIS OFFICIAL
CAPACITY AS CO-CHAIR OF THE
SENATE STANDING COMMITTEE ON
REDISTRICTING; WARREN DANIEL, IN
HIS OFFICIAL CAPACITY AS CO-CHAIR
OF THE SENATE STANDING
COMMITTEE ON REDISTRICTING; PAUL
NEWTON, IN HIS OFFICIAL CAPACITY
AS CO-CHAIR OF THE SENATE
STANDING COMMITTEE ON
REDISTRICTING; SPEAKER OF THE
NORTH CAROLINA HOUSE OF
REPRESENTATIVES TIMOTHY K.
MOORE; PRESIDENT PRO TEMPORE OF
THE NORTH CAROLINA SENATE PHILIP
E. BERGER; THE NORTH CAROLINA
STATE BOARD OF ELECTIONS; DAMON
CIRCOSTA, IN HIS OFFICIAL CAPACITY
AS CHAIRMAN OF THE NORTH
CAROLINA STATE BOARD OF

**MOTION FOR ADMISSION OF
COUNSEL
PRO HAC VICE**

Pursuant to N.C. Gen. Stat. § 84-4.1, Movants Burton Craige, Narendra K. Ghosh and Paul E. Smith hereby move for the admission of Abha Khanna, Aria Branch, and Marc Elias, of the law firm Perkins Coie LLP (collectively "Applicants"), to appear *pro hac vice* on behalf of Plaintiffs in the above referenced matter. In support of this motion, Burton Craige, Narendra K. Ghosh and Paul E. Smith and their law firm, Patterson Harkavy LLP, respectfully show the Court:

1. The Statements of Applicants, attached as **Exhibits A through C** respectively, set forth their qualifications to appear in this cause pursuant to N.C. Gen. Stat. § 84-4.1.

2. Ms. Khanna, Mr. Elias, Ms. Branch and the law firm of Perkins Coie LLP, are counsel of choice for the Plaintiffs Rebecca Harper, Amy Clare Oseroff, Donald Rumph, John Balla, Richard R. Crews, Lilly Nicole Quick. Gettys Cohen Jr., Shawn Rush, Jackson Thomas Dunn, Jr, Mark S. Peters, Joseph Thomas Gates, Kathleen Barnes, Virginia Walters Brien and David Dwight Brown. A statement attesting to the retention of these Applicants and the law firm of Perkins Coie LLP is attached to this Motion as **Exhibit D**.

3. Pursuant to N.C. Gen. Stat. § 84-4.1(5), as local counsel in this matter and a resident of North Carolina, Mr. Craige, Mr. Ghosh and Mr. Smith agree to be responsible for filing the required registration statement for Applicants with the North Carolina State Bar. Additionally, a required fee pursuant to N.C. Gen. Stat. § 84-4.1 is being forwarded simultaneously to the Clerk of Wake County in the total amount of \$675.00 (\$225.00 per applicant) for the *pro hac* admission of Applicants.

WHEREFORE, for the reasons set forth herein, Movants respectfully request the Court to allow this motion for admission of Abha Khanna, Aria Branch, and Marc Elias, of the law firm Perkins Coie LLP, in this action *pro hac vice*.

Respectfully submitted this the 23rd day of June, 2019.

PATTERSON HARKAVY LLP

By: 

Burton Craige

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Narendra K. Ghosh

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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing by email, addressed to the following persons at the following addresses which are the last addresses known to me:

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Counsel for the Legislative Defendants

This the 23rd day of October, 2019.



Narendra K. Ghosh, NC Bar No. 37649

STATE OF NORTH CAROLINA

COUNTY OF WAKE

IN THE GENERAL COURT OF JUSTICE

SUPERIOR COURT DIVISION

Docket No.

REBECCA HARPER; AMY CLARE
OSEROFF; DONALD RUMPH; JOHN
BALLA; RICHARD R. CREWS; LILY
NICOLE QUICK; GETTYS COHEN JR.;
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DUNN, JR.; MARK S. PETERS; JOSEPH
THOMAS GATES; KATHLEEN BARNES;
VIRGINIA WALTERS BRIEN; DAVID
DWIGHT BROWN,

Plaintiffs,

v.

REPRESENTATIVE DAVID R. LEWIS, IN
HIS OFFICIAL CAPACITY AS SENIOR
CHAIR OF THE HOUSE STANDING
COMMITTEE ON REDISTRICTING;
RALPH HISE, IN HIS OFFICIAL
CAPACITY AS CO-CHAIR OF THE
SENATE STANDING COMMITTEE ON
REDISTRICTING; WARREN DANIEL, IN
HIS OFFICIAL CAPACITY AS CO-CHAIR
OF THE SENATE STANDING
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AS CO-CHAIR OF THE SENATE
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NORTH CAROLINA HOUSE OF
REPRESENTATIVES TIMOTHY K.
MOORE; PRESIDENT PRO TEMPORE OF
THE NORTH CAROLINA SENATE PHILIP
E. BERGER; THE NORTH CAROLINA
STATE BOARD OF ELECTIONS; DAMON
CIRCOSTA, IN HIS OFFICIAL CAPACITY
AS CHAIRMAN OF THE NORTH
CAROLINA STATE BOARD OF

ORDER GRANTING
MOTION FOR ADMISSION OF
COUNSEL *PRO HAC VICE*

This cause coming on to be heard before the undersigned on the motion of Burton Craige, Narendra K. Ghosh and Paul E. Smith, attorneys duly admitted to the Bar of the State of North Carolina, for the admission of Abha Khanna, Aria Branch, and Marc Elias, as counsel for Plaintiffs in connection with this case.

IT IS THEREFORE ORDERED that Abha Khanna, Aria Branch, and Marc Elias of the law firm Perkins Coie LLP are allowed to practice in the General Court of Justice of North Carolina and appear on behalf of the Plaintiffs in the above-captioned legal proceeding.

This the ____ day of _____, 20__.

Superior Court Judge Presiding

STATE OF NORTH CAROLINA

COUNTY OF WAKE

IN THE GENERAL COURT OF JUSTICE

SUPERIOR COURT DIVISION

Docket No.

REBECCA HARPER; AMY CLARE
OSEROFF; DONALD RUMPH; JOHN
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COMMITTEE ON REDISTRICTING;
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NORTH CAROLINA HOUSE OF
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CIRCOSTA, IN HIS OFFICIAL CAPACITY
AS CHAIRMAN OF THE NORTH
CAROLINA STATE BOARD OF

**STATEMENT OF
ABHA KHANNA
IN SUPPORT OF MOTION FOR
ADMISSION *PRO HAC VICE***



Pursuant to N.C. Gen. Stat. § 84-4.1(3)-(6), Abha Khanna hereby submits the following statement in support of the Motion for her admission to practice *Pro Hac Vice*:

1. I am an Attorney in the law firm of Perkins Coie LLP. I work at its offices located at 1201 Third Avenue, Suite 4900, Seattle, WA 98101. I was admitted to the New York State Bar in June of 2008 and am an active member in good standing of the New York State Bar. I was admitted to the Washington State Bar in June of 2010 and am an active member in good standing of the Washington State Bar. I have also been admitted to, and am an active member in good standing of (with year of admission noted parenthetically), the United States Courts of Appeals for the Ninth Circuit (2010), Fourth Circuit (2016), Eleventh Circuit (2018), as well as the United States District Court of Washington, Western District (2010), United States District Court of Washington, Eastern District (2013), and the Supreme Court of the United States (2018). I am actively engaged in the practice of law in litigation matters.

2. I have not been subjected to any public discipline by any court or lawyer regulatory organization or had any *Pro Hac Vice* admission revoked.

3. Plaintiffs Rebecca Harper, Amy Clare Oseroff, Donald Rumph, John Balla, Richard R. Crews, Lilly Nicole Quick. Gettys Cohen Jr., Shawn Rush, Jackson Thomas Dunn, Jr, Mark S. Peters, Joseph Thomas Gates, Kathleen Barnes, Virginia Walters Brien and David Dwight Brown have retained my law firm, Perkins Coie LLP, and me to represent them in connection with the above-captioned proceeding.

4. I will continue to represent Plaintiffs Rebecca Harper, Amy Clare Oseroff, Donald Rumph, John Balla, Richard R. Crews, Lilly Nicole Quick. Gettys Cohen Jr., Shawn Rush, Jackson Thomas Dunn, Jr, Mark S. Peters, Joseph Thomas Gates, Kathleen Barnes, Virginia Walters Brien and David Dwight Brown in connection with the above-captioned


action until a final determination is reached or I am permitted by order of this Court to withdraw from representation.

5. I agree to be subject to the orders and amenable to the disciplinary action and the civil jurisdiction of the North Carolina General Court of Justice and the North Carolina State Bar with respect to all matters incident to this proceeding as if I were a regularly admitted and licensed member of the North Carolina Bar in good standing.

6. The Washington State Bar grants like privileges to practice on a *Pro Hac Vice* basis to members of the North Carolina State Bar in good standing.

7. I have associated and am personally appearing with Burton Craige, Narendra K. Ghosh and Paul E. Smith in this action. Mr. Craige, Mr. Ghosh and Mr. Smith are attorneys practicing law with Patterson Harkavy LLP in Chapel Hill, North Carolina, are duly and legally admitted to practice in the General Court of Justice of North Carolina, and are residents of North Carolina. Service of legal proceedings and disciplinary matters may be had upon them in this action with the same effect as if personally made upon me.

Respectfully submitted, this the 10th day of October, 2019.


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STATE OF NORTH CAROLINA
COUNTY OF WAKE

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION

Docket No.

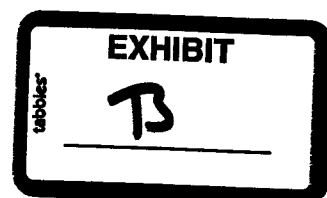
REBECCA HARPER; AMY CLARE
OSEROFF; DONALD RUMPH; JOHN
BALLA; RICHARD R. CREWS; LILY
NICOLE QUICK; GETTYS COHEN JR.;
SHAWN RUSH; JACKSON THOMAS
DUNN, JR.; MARK S. PETERS; JOSEPH
THOMAS GATES; KATHLEEN BARNES;
VIRGINIA WALTERS BRIEN; DAVID
DWIGHT BROWN,

Plaintiffs,

v.

REPRESENTATIVE DAVID R. LEWIS, IN
HIS OFFICIAL CAPACITY AS SENIOR
CHAIR OF THE HOUSE STANDING
COMMITTEE ON REDISTRICTING;
RALPH HISE, IN HIS OFFICIAL
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NEWTON, IN HIS OFFICIAL CAPACITY
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STANDING COMMITTEE ON
REDISTRICTING; SPEAKER OF THE
NORTH CAROLINA HOUSE OF
REPRESENTATIVES TIMOTHY K.
MOORE; PRESIDENT PRO TEMPORE OF
THE NORTH CAROLINA SENATE PHILIP
E. BERGER; THE NORTH CAROLINA
STATE BOARD OF ELECTIONS; DAMON
CIRCOSTA, IN HIS OFFICIAL CAPACITY
AS CHAIRMAN OF THE NORTH
CAROLINA STATE BOARD OF

**STATEMENT OF
ARIA BRANCH
IN SUPPORT OF MOTION FOR
ADMISSION *PRO HAC VICE***



Pursuant to N.C. Gen. Stat. § 84-4.1(3)-(6), Aria Branch hereby submits the following statement in support of the Motion for her admission to practice *Pro Hac Vice*:

1. I am an Attorney in the law firm of Perkins Coie LLP. I work at its offices located at 700 Thirteenth Street, N.W., Suite 600, Washington, DC 20005. I was admitted to the District of Columbia State Bar in June of 2013 and am an active member in good standing of the District of Columbia State Bar. I was admitted to the Virginia State Bar in December of 2012 and am an active member in good standing of the Virginia State Bar. I have also been admitted to, and am an active member in good standing of (with year of admission noted parenthetically), the Bar of the United States Courts of Appeals for the Third (2018), and Fourth (2019) Circuits. Additionally, I have been admitted to the United States District Court for the Eastern District of Virginia (2015) and the United States District Court for the Western District of Wisconsin (2015). I am actively engaged in the practice of law in litigation matters.

2. I have not been subjected to any public discipline by any court or lawyer regulatory organization or had any *Pro Hac Vice* admission revoked.

3. Plaintiffs Rebecca Harper, Amy Clare Oseroff, Donald Rumph, John Balla, Richard R. Crews, Lilly Nicole Quick. Gettys Cohen Jr., Shawn Rush, Jackson Thomas Dunn, Jr, Mark S. Peters, Joseph Thomas Gates, Kathleen Barnes, Virginia Walters Brien and David Dwight Brown have retained my law firm, Perkins Coie LLP, and me to represent them in connection with the above-captioned proceeding.

4. I will continue to represent Plaintiffs Rebecca Harper, Amy Clare Oseroff, Donald Rumph, John Balla, Richard R. Crews, Lilly Nicole Quick. Gettys Cohen Jr., Shawn Rush, Jackson Thomas Dunn, Jr, Mark S. Peters, Joseph Thomas Gates, Kathleen Barnes, Virginia Walters Brien and David Dwight Brown in connection with the above-captioned


action until a final determination is reached or I am permitted by order of this Court to withdraw from representation.

5. I agree to be subject to the orders and amenable to the disciplinary action and the civil jurisdiction of the North Carolina General Court of Justice and the North Carolina State Bar with respect to all matters incident to this proceeding as if I were a regularly admitted and licensed member of the North Carolina Bar in good standing.

6. The District of Columbia State Bar grants like privileges to practice on a *Pro Hac Vice* basis to members of the North Carolina State Bar in good standing.

7. I have associated and am personally appearing with Burton Craige, Narendra K. Ghosh and Paul E. Smith in this action. Mr. Craige, Mr. Ghosh and Mr. Smith are attorneys practicing law with Patterson Harkavy LLP in Chapel Hill, North Carolina, are duly and legally admitted to practice in the General Court of Justice of North Carolina, and are residents of North Carolina. Service of legal proceedings and disciplinary matters may be had upon them in this action with the same effect as if personally made upon me.

Respectfully submitted, this the 15 day of October, 2019.



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STATE OF NORTH CAROLINA
COUNTY OF WAKE

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION

Docket No.

REBECCA HARPER; AMY CLARE
OSEROFF; DONALD RUMPH; JOHN
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NICOLE QUICK; GETTYS COHEN JR.;
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DUNN, JR.; MARK S. PETERS; JOSEPH
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DWIGHT BROWN,

Plaintiffs,

v.

REPRESENTATIVE DAVID R. LEWIS, IN
HIS OFFICIAL CAPACITY AS SENIOR
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COMMITTEE ON REDISTRICTING;
RALPH HISE, IN HIS OFFICIAL
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STATE BOARD OF ELECTIONS; DAMON
CIRCOSTA, IN HIS OFFICIAL CAPACITY
AS CHAIRMAN OF THE NORTH
CAROLINA STATE BOARD OF

**STATEMENT OF
MARC ELIAS
IN SUPPORT OF MOTION FOR
ADMISSION *PRO HAC VICE***



Pursuant to N.C. Gen. Stat. § 84-4.1(3)-(6), Marc Elias hereby submits the following statement in support of the Motion for his admission to practice *Pro Hac Vice*:

1. I am an Attorney in the law firm of Perkins Coie LLP. I work at its offices located at 700 Thirteenth Street, N.W., Suite 600, Washington, DC 20005. I was admitted to the District of Columbia State Bar in June of 1994 and am an active member in good standing of the District of Columbia State Bar. I have also been admitted to, and am an active member in good standing of, the Bar of the United States Courts of Appeals for the District of Columbia (1995), Third (2010), Fourth (2014), Fifth (2011), Ninth (2016), Tenth (1995), and Eleventh (2017) Circuits. Additionally, I have been admitted to the United States District Court for the District of Columbia (1995), United States District Court for the Northern District of Florida (2015), United States District Court for the Eastern District of Michigan (1995), United States District Court for the Western District of Wisconsin (2015), and the Supreme Court of the United States (2009). I am actively engaged in the practice of law in appellate and litigation matters.

2. I have not been subjected to any public discipline by any court or lawyer regulatory organization or had any *Pro Hac Vice* admission revoked.

3. Plaintiffs Rebecca Harper, Amy Clare Oseroff, Donald Rumph, John Balla, Richard R. Crews, Lilly Nicole Quick. Gettys Cohen Jr., Shawn Rush, Jackson Thomas Dunn, Jr, Mark S. Peters, Joseph Thomas Gates, Kathleen Barnes, Virginia Walters Brien and David Dwight Brown have retained my law firm, Perkins Coie LLP, and me to represent them in connection with the above-captioned proceeding.

4. I will continue to represent Plaintiffs Rebecca Harper, Amy Clare Oseroff, Donald Rumph, John Balla, Richard R. Crews, Lilly Nicole Quick. Gettys Cohen Jr., Shawn Rush, Jackson Thomas Dunn, Jr, Mark S. Peters, Joseph Thomas Gates, Kathleen Barnes, Virginia


Walters Brien and David Dwight Brown in connection with the above-captioned action until a final determination is reached or I am permitted by order of this Court to withdraw from representation.

5. I agree to be subject to the orders and amenable to the disciplinary action and the civil jurisdiction of the North Carolina General Court of Justice and the North Carolina State Bar with respect to all matters incident to this proceeding as if I were a regularly admitted and licensed member of the North Carolina Bar in good standing.

6. The District of Columbia State Bar grants like privileges to practice on a *Pro Hac Vice* basis to members of the North Carolina State Bar in good standing.

7. I have associated and am personally appearing with Burton Craige, Narendra K. Ghosh and Paul E. Smith in this action. Mr. Craige, Mr. Ghosh and Mr. Smith are attorneys practicing law with Patterson Harkavy LLP in Chapel Hill, North Carolina, are duly and legally admitted to practice in the General Court of Justice of North Carolina, and are residents of North Carolina. Service of legal proceedings and disciplinary matters may be had upon them in this action with the same effect as if personally made upon me.

Respectfully submitted, this the 15 day of October, 2019.



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NORTH CAROLINA

WAKE COUNTY

REBECCA HARPER, et al.,

Plaintiffs,

v.

REPRESENTATIVE DAVID R. LEWIS,
IN HIS OFFICIAL CAPACITY AS
SENIOR CHAIRMAN OF THE HOUSE
SELECT COMMITTEE ON
REDISTRICTING, et al.,

Defendants.

GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
19-cv-012667

**STATEMENT IN SUPPORT OF
ADMISSION PRO HAC VICE**

NOW COMES John Balla and in support of the Motions for Admission of Abha Khanna, Aria Branch, and Marc Elias *Pro Hac Vice*, shows the Court as follows:

1. My address is 7353 Newport Ave., Raleigh, NC 27613; and
2. I have retained Abha Khanna, Aria Branch and Marc Elias, of the law firm Perkins Coie LLP to represent me in the above-captioned action.

This the 15 day of October, 2019.

John Balla

